

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Criminal No. 23-748 KWR

SOLOMON PENA, DEMETRIO TRUJILLO,  
and JOSE TRUJILLO,

Defendants.

**DEFENDANT SOLOMON PENA'S MOTION TO  
CONTINUE TRIAL DATE AND TO CONTINUE DEADLINES**

COMES NOW the Defendant, SOLOMON PENA, by and through his attorney of record, ELIZABETH A. HONCE, ESQ., and hereby moves the Court to grant a Motion to Continue the Trial Date presently set, and also to continue deadlines in this matter. Grounds for the Motion are as follows:

1. Counsel for Defendant Pena has just been informed that her only brother is very ill and not expected to live past the end of this week.
2. The brother of Counsel for Defendant Pena lives in the state of West Virginia.
3. Counsel for Defendant Pena is being asked by her brother's caregivers to return to West Virginia immediately to see her brother alive one last time and help with the funeral.
4. Counsel for Defendant Pena is praying the Court for a modest continuance and extension of deadlines of two weeks from the current trial date of September 16, 2024.

Dated August 27, 2024.

5. Counsel for the United States was contacted and they do not oppose a one-week continuance.

Respectfully submitted,

By: /s/ Elizabeth A. Honce

ELIZABETH A. HONCE, ESQ.

Attorney for Defendant Solomon Pena

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 27, 2024, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means as more fully reflected on the Notice of Electronic Filing:

Assistant United States Attorney Jeremy Pena

Assistant United States Attorney Patrick Cordova

Senior Litigation Counsel Ryan Crosswell

**COUNSEL FOR THE UNITED STATES**

/s/ Elizabeth A. Honce, Esq.

Elizabeth A. Honce, Esq.